

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_lazo@fd.org

7 Attorney for Jakarr Dudley

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAKARR DUDLEY,

15 Defendant.

Case No. 2:20-CR-037-GMN-NJK

STIPULATION TO CONTINUE
REPLY DEADLINE TO
GOVERNMENT'S RESPONSE (ECF
NO. 28) TO MOTION
TO SUPPRESS (ECF NO. 23)
(Second Request)

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18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Brian Y. Whang, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Jakarr Dudley, that the reply
22 deadline to the Government's Response (ECF No. 28) to Defendant's Motion to Suppress (ECF
23 No. 23) currently scheduled for Friday, October 23, 2020, be vacated and set to Wednesday,
24 October 28, 2020.
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1 This Stipulation is entered into for the following reasons:

2 1. Defense counsel requires additional time to file Mr. Dudley's reply. Defense
3 counsel has had other competing deadlines, including a continued evidentiary hearing in
4 *United States v. Carter*, 2:19-cr-093-RFB-EJY (October 22, 2020) and an evidentiary hearing
5 in *United States v. Nivongso*, 2:19-cr-323-RFB-NJK (October 27, 2020).

6 2. Defense counsel does not anticipate any further requested continuances absent
7 extraordinary circumstances.

8 3. The defendant is not incarcerated and does not object to the continuance.

9 4. The parties agree to the continuance.

10 5. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow counsel for defendant sufficient time within which to be able to effectively
12 prepare a reply.

13 6. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 This is the second request to continue the reply deadline dates filed herein.

16 DATED this 22nd day of October, 2020.

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18 RENE L. VALLADARES
19 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

20 /s/ Raquel Lazo
21 By _____
22 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Brian Y. Whang
By _____
BRIAN Y. WHANG
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAKARR DUDLEY,

7 Defendant.

Case No. 2:20-CR-037-GMN-NJK

ORDER

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9 **ORDER**

10 IT IS THEREFORE ORDERED that defense counsel's replies to the Government's
11 Response (ECF No. 28) to Defendant's Motion to Suppress (ECF No. 23) currently due on
12 Friday, October 23, 2020, be vacated and continued to Wednesday, October 28, 2020.

13 DATED this 23 day of October, 2020.

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17 UNITED STATES MAGISTRATE JUDGE
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